



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

December 16, 2013

Holly Hutchinson, Team Leader  
Payette National Forest  
800 W. Lakeside Avenue  
McCall, Idaho 83638

Re: U.S. Environmental Protection Agency comments on the Lost Creek-Boulder Creek Landscape Restoration Project Draft Environmental Impact Statement, Payette National Forest, New Meadows Ranger District (EPA Project Number: 13-0011-AFS).

Dear Ms. Hutchinson:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the proposed Lost Creek-Boulder Creek Landscape Restoration Project on the New Meadows Ranger District of the Payette National Forest. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DEIS analyzes the Forest Service's proposal to implement treatments that would 1) move the proposed project area toward a more resilient condition and provide a diversity of habitats consistent with the Forest's Wildlife Conservation Strategy; 2) move the project area toward the desired condition for soil, water, riparian, and aquatic resources; 3) manage recreation; and 4) contribute to the economic vitality of the communities adjacent to the Payette National Forest. Proposed treatments would include commercial and noncommercial vegetation treatments on approximately 40,000 acres; prescribed fire on 45,000 acres; watershed improvements including road closures, decommissioning, and 40 fish passage barrier improvements; and recreation improvements. The project units would be located within an 80,000 acre project area. The DEIS analyzes a no action alternative and four action alternatives. Alternative B is the proposed action and would conduct vegetation treatments on approximately 41,900 acres.

The EPA is supportive of the overarching goals and objectives of the proposed project, and we find the DEIS to be clear, well organized, and robust. We also appreciate the Forest's responsiveness to issues raised during the scoping process. We support the approach to Riparian Conservation Area Treatments laid out in Appendix A, as well as the document's thoughtful approach to vegetation treatments. Overall, we find the treatments proposed under Alternatives B and D to align well with the broad body of science emerging about dry and moist mixed conifer forests<sup>1</sup>. We are less supportive of Alternative C as we believe the ecological return would be less in terms of quality and duration when compared to Alternatives B and D.

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<sup>1</sup> [http://www.fs.fed.us/pnw/publications/MMC\\_Synthesis\\_21Nov13.pdf](http://www.fs.fed.us/pnw/publications/MMC_Synthesis_21Nov13.pdf)

We also recognize the Forest's focus on improving hydrologic condition within the project area. We are very supportive of the proposed road closure, decommissioning and culvert replacement work. In addition we appreciate the attention placed on supporting the implementation of the West Fork of the Weiser River TMDL (IDEQ 2013). We also commend the Forest for using the Geomorphic Roads Analysis and Inventory Package to help prioritize sediment related work, and we support the continued use of GRAIP to identify additional site specific sediment improvement activities.

Our review identified questions related to burning, planting, and the establishment of grass/forb/shrub/seedling habitat that we recommend be addressed in the Final EIS. We also recommend definitional clarity/consistency around the terms "canopy closure" and "canopy cover." These questions are detailed below.

### **Artificial Regeneration**

The DEIS notes that artificial regeneration (planting trees) may be a component of the project where the desired species composition would not be expected to be met with natural regeneration, or where necessary to meet desired stocking levels. Where that planting would occur, it would be done consistent with Standard with TRST01 on page III-42 of the Forest Plan (USDA Forest Service 2003).

The EPA is supportive of ensuring stands are on an ecologically appropriate trajectory in terms of species composition, and we note the challenge associated with reestablishing early seral species (ponderosa pine, larch, etc) in patches where grand fir has a well established seed bank. We also note however that Potential Vegetation Groups 2, 5 and 6 are below the desired range for grass/forb/shrub/seedling and sapling tree size classes. In addition, we note that a number of recent studies point to historical stand densities in dry and moist mixed conifer stands that are lower than those reflected in the 2003 Forest Plan.

### *Recommendations:*

- We recommend the FEIS give additional consideration to the effects on GFSS habitat associated with artificial regeneration.
- We recommend the FEIS consider recent science<sup>2</sup> and provide additional context and direction regarding when artificial regeneration would be appropriate
- We recommend the FEIS discuss potential planting and stocking densities beyond referencing Standard TRST01 in the 2003 Forest Plan. We believe the Forest Plan provides some flexibility for management by noting that, "a certified silviculturist may prescribe different minimum stocking requirements, which are more appropriate for site-specific conditions and stand management objectives."

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<sup>2</sup> Hagmann, R. K., J. F. Franklin, and K. N. Johnson. 2013. Historical structure and composition of ponderosa pine and mixed-conifer forests in south-central Oregon. *Forest Ecology and Management*. 49 pp.

Merschel, A. G. 2012. Mixed-conifer forests of central Oregon: structure, composition, history of establishment, and growth. Master's Thesis, Oregon State University. 167 p.

Merschel, A. G., Spies, T.A., Heyerdahl, E.K. 2013. Mixed-conifer forest of central Oregon: Effects of logging and fire exclusion vary with environment. In Review.

### **Prescribed and Maintenance Burning**

Under Alternative B the Forest would conduct prescribed burning on approximately 45,000 acres of the project over the next 15-20 years. Further, the DEIS states on page 37 that maintenance burning would occur every 5-10 years to maintain suitable north Idaho ground squirrel habitat and areas representative of high frequency fire regimes. The EPA supports the reintroduction of fire into these fire prone landscapes, and we believe maintenance burning is critical to ensuring treated stands remain on the desired trajectory. What is not clear in the DEIS is whether or to what extent artificial regeneration might affect the scheduling of maintenance burning. Could planting potentially delay maintenance burning until such time as seedlings are more fire resilient? If so, could this affect the long term species composition and fire resiliency of the stand?

#### *Recommendation:*

- We recommend the FEIS clarify management intent with regard to planting in those areas where maintenance burning should be pursued.

### **Canopy Cover/Canopy Closure**

In the discussion of alternatives, the DEIS uses the terms "canopy cover" and "canopy closure" interchangeably. These terms both refer to ways of measuring forest canopies, but "canopy cover" refers to the percent of a fixed area covered by the tree crown, whereas "canopy closure" is the proportion of the sky hemisphere obscured by vegetation when viewed from a single point. We recommend the FEIS identify one approach for measuring forest canopy and use it consistently throughout the document. In general, the EPA prefers canopy cover as a measure of forest canopy.

Based on our review, we are rating the DEIS as LO (Lack of Objections). We support the collaborative, science-based ecosystem restoration of priority forest landscapes consistent with the purpose of the Collaborative Forest Landscape Restoration Program. We also support the Forest's continuing engagement of the Payette Forest Coalition on this project.

We appreciate the opportunity to review and comment on the DEIS, and we look forward to furthering our understanding of this and other CFLRP projects as they develop. If you have any questions about our review, please contact me at (206) 553-1601, or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov). Or you may contact Teresa Kubo of my staff at (503) 326-2859, or by electronic mail at [kubo.teresa@epa.gov](mailto:kubo.teresa@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.